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6 Attorneys for Defendant State of
7 Nevada Ex. Rel. Board of Regents
8 of Nevada System of Higher Education

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10 UNITED STATES DISTRICT COURT
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12 DISTRICT OF NEVADA

13 CHRISTINE CASEY,) Case No. 3:20-cv-00720-MMD-CLB
14 Plaintiff,)
15 vs.)
16 STATE OF NEVADA EX. REL. BOARD OF)
17 REGENTS OF NEVADA SYSTEM OF)
18 HIGHER EDUCATION, a state entity, Victor)
19 Redding, an individual, Thomas Reilly, an)
20 individual, Joseph Reynolds, an individual,)
21 Crystal Abba, an individual, Dean Gould, an)
22 individual, Zelam Bogale, an individual, DOES)
23 1-50 inclusive, and ROE Corporations 1-50)
24 inclusive.)
Defendants.)

STIPULATION AND REQUEST FOR
EXTENSION OF TIME FOR
DEFENDANT STATE OF NEVADA
EX. REL. BOARD OF REGENTS OF
NEVADA SYSTEM OF HIGHER
EDUCATION TO RESPOND TO
PLAINTIFF'S COMPLAINT

(First Request)

The Parties, by and through their respective counsel of record, stipulate and request that this Court extend the time for Defendant State of Nevada Ex. Rel. Board of Regents of Nevada System of Higher Education (hereinafter referred to as "NSHE"), to respond to Plaintiff's Complaint, up to and including, Friday, March 5, 2021. In support of this Stipulation and Request, the parties state as follows:

1. Plaintiff served Defendant NSHE with a copy of the Summons and Complaint on January 13, 2021. The present deadline for NSHE to respond to Plaintiff's Complaint is Wednesday, February 3, 2021.

2. At the present time, it is the undersigned counsel's understanding that none of the individually-named parties have yet been served in this matter.

3. On January 27, 2021, Scott Abbott, counsel for NSHE, contacted Plaintiff's counsel, Jenny Foley, to advise that his law firm was currently assessing potential joint representation of the individually-named parties, along with its representation of NSHE, and requested an extension of time to respond to the Complaint. Ms. Foley and Mr. Abbott agreed to a 30-day extension of time for NSHE to respond to Plaintiff's Complaint.

4. This is the first request for an extension of time for Defendant NSHE to respond to Plaintiff's Complaint, and is not sought for any improper purpose or other reason of delay. This extension is sought only to secure sufficient time to assess whether all of the named Defendants may be jointly represented in this matter and to gather information necessary to respond to Plaintiff's Complaint.

WHEREFORE, the parties respectfully request that Defendant NSHE be permitted an extension of time, up to and including **March 5, 2021**, to respond to Plaintiff's Complaint.

DATED this 2nd day of February 2021.

HKM EMPLOYMENT ATTORNEYS LLP

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Attorneys for Defendant NSHE

ORDER

IT IS SO ORDERED.

DATED: February 2, 2021

UNITED STATES MAGISTRATE JUDGE

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